JAP:MPC

UNITED STATES DISTRICT COURT EASTERN DISTRICT OF NEW YORK

M 11-1237

UNITED STATES OF AMERICA

COMPLAINT

- against -

(T. 18, U.S.C., § 472)

KAROL ANDREA CHILITO-SOLARTE,

Defendant.

EASTERN DISTRICT OF NEW YORK, SS:

TIMOTHY AUMAN, being duly sworn, deposes and says that he is a Special Agent with the United States Secret Service, duly appointed according to law and acting as such.

Upon information and belief, on or about December 15, 2011, within the Eastern District of New York, the defendant KAROL ANDREA CHILITO-SOLARTE, with intent to defraud, pass, utter, publish or sell, kept in her possession counterfeit obligations of the United States, to wit, Federal Reserve Notes in \$100 denominations.

(Title 18, United States Code, Section 472).

The source of your deponent's information and the grounds for his belief are as follows:

1. On or about December 15, 2011, at approximately 5:12 a.m., the defendant KAROL ANDREA CHILITO-SOLARTE arrived at John F. Kennedy International Airport ("JFK") in Queens, New York, from Medellin, Colombia.

- 2. When going through a Customs and Border Protection ("CBP") checkpoint at Terminal 4 in JFK Airport, KAROL ANDREA CHILITO-SOLARTE was selected for a baggage exam. During this exam, CBP officers noted that the bottom of KAROL ANDREA CHILITO-SOLARTE's suitcases felt unusually thick. CBP officers discovered a false bottom on first suitcase they inspected. CBP officers probed the false bottom of the suitcase and discovered numerous packages of what appeared to be United States currency concealed within the false bottom. CPB officers inspected the bottom of the second suitcase and again found a false bottom with packages of what appeared to be United States currency. Upon inspection of these packages, CBP inspectors discovered that KAROL ANDREA CHILITO-SOLARTE had approximately 2,992 Federal Reserve Notes in \$100 denominations, totaling \$299,200. On closer inspection, the notes appeared to be counterfeit.
- 3. CBP Officers then contacted the United States

 Secret Service. I responded to the CBP checkpoint. I am trained in the examination and detection of genuine obligations of

the United States, and I examined the above-described Federal Reserve Notes and determined that they were not genuine.

WHEREFORE, your deponent respectfully requests that the defendant KAROL ANDREA CHILITO-SOLARTE be dealt with according to law.

> TIMOTHY AUMAN Special Agent

U.S. Secret Service

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Sworn to before me this 15th day of December 2011